

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GREAT WESTERN INSURANCE COMPANY :

Plaintiff, :

vs. :

MARK GRAHAM, DONALD SOLOW, BLUE :
CAPITAL MANAGEMENT, INC., BLUE :
ALTERNATIVE ASSET MANAGEMENT LLC, :
WILMINGTON SAVINGS FUND SOCIETY, :
FSB, CHRISTIANA TRUST, REGATTA :
HOLDINGS LLC, CYGNET 001 MASTER :
TRUST, CYGNET 001 MASTER TRUST SERIES :
2011-A, CYGNET 001 MASTER TRUST SERIES :
2011-C, CYGNET 001 MASTER TRUST SERIES :
2013-A, ALPHA RE LIMITED, ALPHA RE :
HOLDINGS (CAYMAN) LIMITED, ATLANTIC :
SPECIALTY FINANCE, BLUE ELITE FUND :
LTD., BLUE ELITE FUND LP, BLUE II LTD., :
SANCUS CAPITAL BLUE CREDIT :
OPPORTUNITIES FUND LTD., ABILITY :
INSURANCE COMPANY, JOHN DRAKE, :
EDWARD BRENDAN LYNCH, AND :
GREGORY TOLARAM. :


Defendants. :

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Civil Action No. 18-cv-06249-VSB

Hon. Vernon S. Broderick

**NOTICE OF MOTION TO BE
RELIEVED AS COUNSEL**

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 12/21/2018

PLEASE TAKE NOTICE, that pursuant to Rule 1.4 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Shaun I. Blick, Joseph P. McNulty, and John Burke, attorneys with the law firm Kennedys CMK LLP, having previously been admitted *pro hac vice* or otherwise having entered appearances in this matter, hereby move this Court for an Order relieving them as counsel for Defendant Gregory Tolaram in the above-captioned action.

In support of this motion, the Declaration of Shaun I Blick is submitted herewith.

Dated: 12/20/2018

Respectfully Submitted,

S/ Shaun I. Blick

Shaun I. Blick, Esq.

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
GREAT WESTERN INSURANCE COMPANY	:	
	:	Civil Action No. 18-cv-06249-VSB
Plaintiff,	:	
	:	Hon. Vernon S. Broderick
vs.	:	
	:	
MARK GRAHAM, DONALD SOLOW, BLUE	:	DECLARATION OF SHAUN I.
CAPITAL MANAGEMENT, INC., BLUE	:	BLICK IN SUPPORT OF MOTION
ALTERNATIVE ASSET MANAGEMENT LLC,	:	TO BE RELIEVED AS COUNSEL
WILMINGTON SAVINGS FUND SOCIETY,	:	
FSB, CHRISTIANA TRUST, REGATTA	:	
HOLDINGS LLC, CYGNET 001 MASTER	:	
TRUST, CYGNET 001 MASTER TRUST SERIES	:	
2011-A, CYGNET 001 MASTER TRUST SERIES	:	
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2013-A, ALPHA RE LIMITED, ALPHA RE	:	
HOLDINGS (CAYMAN) LIMITED, ATLANTIC	:	
SPECIALTY FINANCE, BLUE ELITE FUND	:	
LTD., BLUE ELITE FUND LP, BLUE II LTD.,	:	
SANCUS CAPITAL BLUE CREDIT	:	
OPPORTUNITIES FUND LTD., ABILITY	:	
INSURANCE COMPANY, JOHN DRAKE,	:	
EDWARD BRENDAN LYNCH, AND	:	
GREGORY TOLARAM.	:	
	:	
Defendants.	:	
	:	
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I, Shaun I. Blick, declare under penalty of perjury that the following is true and correct:

1. I am a partner in the law firm of Kennedys CMK LLP.
2. I have personal knowledge of the facts stated herein.
3. I submit this declaration in support of motion to relieve me, and my colleagues, Joseph P. McNulty, and John Burke, attorneys with the law firm Kennedys CMK LLP, to withdraw as counsel for Defendant Gregory Tolaram in the above-captioned action.
4. This motion is based on the fact that we have reached an insurmountable impasse with Mr. Tolaram that prohibits us from moving forward with the representation.

5. Simultaneous with the filing of the instant motion, we are serving this application and any other supporting materials already submitted to the Court upon Mr. Tolaram.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on: 12/20/2018

Respectfully Submitted,

S/ Shaun I. Blick

Shaun I. Blick, Esq.

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